

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

IN THE MATTER OF:	)	Docket No. CWA-402-9-03-29
	)	
THE SOUTH COAST WATER DISTRICT	)	<b>FINDINGS OF VIOLATION</b>
	)	<b>AND</b>
Proceeding under Sections 308(a) and 309(a)	)	<b>ORDER FOR COMPLIANCE</b>
of the Clean Water Act	)	
	)	
	)	
	)	

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**STATUTORY AUTHORITY**

The following Findings are made and Order issued under authority vested in the Administrator of the United States Environmental Protection Agency ("EPA") under Sections 308(a) and 309(a) of the Clean Water Act, as amended ("CWA"), 33 U.S.C. §§ 1318(a), 1319(a). This authority has been delegated to the Regional Administrator of EPA, Region 9, and re-delegated by the Regional Administrator to the Director, Water Division ("Director"). Notice of this action has been given to the State of California Regional Water Quality Control Board, San Diego Region (Regional Board).

**FINDINGS OF VIOLATION**

On the basis of the following facts, the Director of the Water Division of EPA, Region 9, finds that the South Coast Water District is in violation of Section 301(a) of the Act, 33 U.S.C. § 1311(a):

1. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), provides that except as in compliance with certain specified section of the CWA, including Section 402, "the discharge of any pollutant by any person shall be unlawful." Under Section 402 of the CWA, EPA or the State of California, Regional Water Quality Control Board issues National Pollutant Discharge Elimination System permits ("NPDES permits") for the discharge of pollutants into navigable waters located within the State of California.

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2. Pollutants include sanitary sewage. 33 U.S.C. § 1362(6). A point source is any confined and discrete conveyance, including a pipe or other conduit. 33 U.S.C. § 1362(14). Navigable waters are defined as "waters of the United States," which include all waters used in interstate commerce, including tidal waters and all their tributaries. 33 U.S.C. § 1362(7); 40 C.F.R. §§ 122.3, 230.3(s).
3. The South Coast Water District ("South Coast WD" or "District") is a political subdivision of the State of California and as such is a person under Section 502(5) of the CWA. 33 U.S.C. § 1362(5).
4. South Coast WD operates a separate sanitary sewage collection system that collects sanitary sewage from the City of Dana Point, and portions of the cities of Laguna Beach and San Clemente and conveys the wastewater to two wastewater treatment plants owned by South Orange County Wastewater Authority (SOCWA), the Aliso Treatment Plant and San Juan Treatment Plant. The South Coast WD collection system includes approximately 139 miles of sanitary sewage pipes and 14 pump stations (this system hereinafter is collectively referred to as "the sewage collection system" or "the collection system").
5. The South Coast Water District was formed in 1932. The last consolidation of districts occurred in 1999 when South Coast Water District consolidated with Capistrano Beach Water District and Dana Point Sanitary District.
6. The Regional Board reissued NPDES Permit CA0107611 to the Aliso Water Management Agency (AWMA) on February 21, 2001 authorizing discharge of treated wastewater to the Pacific Ocean through the Aliso Ocean Outfall. (AWMA has since consolidated with other agencies to form the South Orange County Wastewater Authority or SOCWA.) According to Finding 4 of NPDES Permit CA0107611, the South Coast Water District is an Agency Member of AWMA (now SOCWA). According to Finding 9 of NPDES Permit CA0107611, the South Coast Water District and other Member Agencies, convey wastewater to the AWMA (now SOCWA) Coastal Treatment Plant for treatment. Prohibition A.1. of NPDES Permit CA0107611 states that discharges of waste in a manner or to a location which have not been specifically authorized by the permit are prohibited. NPDES Permit CA0107611 was previously reissued by the Regional Board on December 14, 1995 containing similar findings at Findings 6 and 11 and condition A.2. prohibiting discharges except at the ocean outfall location authorized by the permit.
7. The Regional Board reissued NPDES Permit CA 0107417 to the South East Regional Reclamation Authority on February 9, 2000 authorizing discharge of treated wastewater to the Pacific Ocean through the San Juan Creek Ocean Outfall (South East Regional Reclamation Authority has since consolidated with other agencies to form the South Orange County Wastewater Authority or SOCWA.)

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8. The South Coast Water District is subject to California Regional Water Quality Control Board (RWQCB) Waste Discharge Requirements Order No. 96-04 which covers collection systems and prohibits all spills.
9. On December 16, 2002, the California Regional Water Quality Control Board, San Diego Region issued Complaint No. R9-2002-0280 for Administrative Civil Liability against the South Coast Water District for failure to develop, implement, and maintain a Sanitary Sewer Overflow Prevention Plan, and failure to submit complete sewer overflow reports and submitting reports late. In response to the Complaint, the District improved its Sanitary Sewer Overflow Prevention Plan and Sanitary Sewer Overflow Response Plan.
10. By letter dated September 24, 2001, the District provided EPA with copies of spill reports. During a July 2002 site visit by EPA, the District provided additional reports of spills which occurred subsequent to the District's September 2001 letter. EPA obtained additional spill information between July 2002 through March 2003 from the San Diego Regional Water Quality Control Board. Only spills that originated from District owned and operated sewer pipes and pump stations were used in this order, spills originating from private laterals or systems were not included.
11. During the period from February 1, 1999 through March 31, 2003, South Coast WD reported 49 sewage spills from portions of the sewage collection system owned and operated by the South Coast Water District. The District reported 3 spills in the first three months of 2003; 7 spills in calendar year 2002; 11 spills in calendar year 2001, 15 spills in calendar year 2000; and 13 spills in calendar year 1999.
12. Between February 1, 1999 and March 31, 2003, the District reported that 21 of the 49 sewage spills from its collection system were to waters of the U.S. A list of sewage spills to waters of the U.S. by the South Coast Water District is included as Attachment 1 and made a part of this Finding of Violation. Each of the 21 sewage spills listed in Attachment 1 was a discharge of pollutants from a point source to waters of the United States.
13. EPA and its contractor, SAIC, conducted a site visit of the District's sewage collection system on July 16, 2002. The District's sewage collection system is evaluated in the draft report titled "NPDES Compliance Evaluation Report: South Coast Water District, CA, dated August 15, 2002." This draft report includes recommendations intended to improve collection system maintenance and reduce spills.
14. EPA finds that sewage spills from the South Coast WD collection system are caused by blockage of sewer lines, usually caused by roots, grease build-ups and debris; construction accidents; and, most recently, several problems at sewer lift stations. Root blockages is the leading cause of spills, responsible for more than 65% of the spills from

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the collection system. Three spills have occurred at lift stations between August 2002 and January 2003.

15. The District recently completed its first five-year strategic plan to improve performance of its wastewater collection and water facilities summarized in a draft of "South Coast Water District Strategic Plan", dated August 28, 2003. The Strategic Plan describes the District's plans to implement a computerized maintenance management system; clean and perform video inspections of the sewer pipes; control root blockages; and control grease discharges to the collection system.
16. I therefore find that the South Coast Water District, on 21 occasions, as set forth in Paragraph 12 above, discharged pollutants from a point source to waters of the United States without authorization of an NPDES permit and is in violation of Section 301(a) of the CWA.

Considering the foregoing Findings and the potential environmental and human health effects of the violations, EPA has determined that compliance in accordance with the following requirements is reasonable. Pursuant to the authority of Sections 308(a) and 309(a) of the CWA, it is hereby ORDERED:

**ORDER FOR COMPLIANCE**

The South Coast Water District shall implement a Plan for reducing and eliminating sewage spills from the South Coast WD sanitary sewer collection system. The Plan is required to have components described in paragraphs I to III of this Order. The Plan is subject to review and approval by EPA as specified in paragraph IV of this Order. The District shall continue to implement its current program for controlling sewage spills, and it shall take steps immediately to begin implementing improvements to its current program. A timetable for submittal of plans and reports required by this Order is included as Attachment 2 to this Finding of Violation and Order for Compliance.

**I. IMMEDIATE REDUCTION OF COLLECTION SYSTEM SPILLS**

- A. Full compliance with the CWA requires that there be no unpermitted discharge of wastewater from the collection system to waters of the U.S. To ensure continuous improvement in spill reduction performance, as an interim standard, the South Coast Water District shall, each year, consistently and substantially reduce the frequency and volume of sanitary sewage spills to waters of the U.S.
- B. Compliance with the reduction in spills specified by the preceding paragraph shall not, however, constitute full compliance with the CWA. Only elimination of all

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unpermitted overflows and spills to waters of the United States shall constitute full compliance.

- C. If, during any year, the District fails to meet the interim standard in Paragraph I.A, the annual report required pursuant to Paragraph VI shall describe actions the District plans to undertake in order to further eliminate spills and comply with the interim standard in Paragraph I.A. and set forth numeric spill reduction goals for three subsequent years.

**II. SPILL RESPONSE**

The South Coast Water District shall consider a revision to its Sanitary Sewer Overflow Response Plan. The SSORP should include a list of necessary spare parts and emergency equipment needed. The SSORP should clarify the importance of cleaning storm drains if sewage does enter a drain.

**III. CONTROL OF NON-CAPACITY RELATED SPILLS****A. Sewer System Cleaning and Root Control Program:**

1. By March 1, 2004, the District shall submit a plan to EPA describing its Sewer System Cleaning and Root Control Program. The program must be sufficient to eliminate or reduce blockage related spills and shall include each of the following elements:
  - a. A schedule for periodic cleaning of the entire sewage collection system;
  - b. A hot spot cleaning schedule for more frequent cleaning of sections of the collection system known to be in poor condition or prone to blockage by roots, grease or debris. The plan shall identify all pipe sections in the hot spot cleaning program and describe procedures for adding or deleting pipe sections from the hot spot list;
  - c. A comprehensive plan for controlling intrusion and blockage of sewer pipes by roots. In developing the root control portion of the plan, the District shall consider all options for controlling roots including sewer pipe cleaning and rodding; chemical treatment; control of roots in private laterals; and repair, rehabilitation, or replacement of sewer pipes prone to root blockage;
  - d. Written procedures for cleaning and repairing sewer pipes in easements including cleaning schedules, instructions for gaining access to sewer pipes in easements, and cleaning procedures; and

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- e. A plan and schedule for maintaining and ensuring access to sewer pipes in easements.
2. By September 1 of each year, the District shall submit an annual report to EPA documenting activities of the District's sewer cleaning and root control program during the previous year including miles of pipe cleaned as part of the routine and hot spot cleaning programs, and miles of pipe treated by each method used for controlling roots. The District shall include a description of the success of the sewer cleaning and root control program at preventing blockages and sewage overflows and any changes to be made in the program to further reduce spills.
- B. Maintenance Management System:** The District shall consider obtaining and implementing a computerized sewer maintenance management system capable of scheduling and tracking completion of sewer and pump station cleaning, maintenance and repairs. If implemented, the maintenance management system shall be linked to a Geographic Information System (GIS) map of the sewage collection system.
- C. Sewer Pipe Inspection and Condition Assessment:**
1. By March 1, 2004 the District shall submit a plan to EPA for periodic inspection and assessment of the condition of gravity sewers and maintenance holes in the District's collection system. The inspection and condition assessment program shall be sufficient to assess the condition of pipes following blockage related spills, identify pipes in need of emergency repair, and provide timely updates to the system-wide condition assessment completed in 2001 and 2002. The plan shall describe:
    - a. Inspection methods to be used, including direct visual inspection and CCTV inspection, and whether the District will purchase, lease, or contract for CCTV inspection equipment;
    - b. An inspection schedule including an estimation of how many maintenance holes and miles of pipe will be inspected each year for the next 5 years; and
    - c. A system for timely evaluation of inspection findings and documentation of the assessed condition.
  2. By September 1 of each year, the District shall submit an annual report to EPA summarizing the findings of the sewer pipe condition assessments conducted during the previous year and the miles of sewer pipe and number of maintenance holes planned to be inspected during the current fiscal year. The

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report shall indicate the inspection methods used.

**D. Sewer Repair, Rehabilitation and Replacement**

1. The District shall submit to EPA by March 1, 2004, a plan to repair, rehabilitate, and replace damaged and old sewer pipes. The plan shall include schedules and financial plan, for both short-term (repairs of acute defects to occur within one year of inspection and assessment completed) and long-term repair, rehabilitation and replacement of sewer pipes. The plan shall be sufficient to: 1) ensure timely repair of sewer pipes in imminent danger of failure or blockage; 2) ensure the long range sustainable replacement of obsolete assets; and 3) improve system performance and reduce spills caused by pipe defects. The plan shall include:
  - a. An estimation of how many sewer pipes annually will undergo emergency repair or replacement;
  - b. An estimation of how many miles of sewer pipe will be rehabilitated or replaced over the next 10 years and identification of the pipe reaches that will be rehabilitated or replaced in the next 5 years; and
  - c. A 10-year financial plan for short-term and long-term repair, rehabilitation, and replacement of sewer pipes.
2. By September 1 of each year, the District shall submit an annual report to EPA documenting sewer repair, rehabilitation or replacement activities completed in the previous year; describing projects to be completed in the coming year; and providing an updated 10-year Capital Improvement Plan (CIP).
3. By September 1, 2004, the District shall submit to EPA a schedule and financial plan for completing a project sufficient to ensure the continuous conveyance of wastewater collected in the South Coast Water District to the SOCWA Coastal Treatment Plant.

**E. Pump Station Maintenance and Inventory**

1. The District shall complete a study of the condition of each pump station in the District's collection system and submit a report to EPA documenting the findings and recommendations by September 1, 2004. At a minimum the evaluation shall:

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- a. Identify problems that resulted in recent overflows from pump stations and assess the potential of similar problems occurring at other pump stations in system;
  - b. Provide recommendations for standby generators and alarm systems as needed; and
  - c. Describe any other conditions that may affect the continuous operation of each pump station.
2. By March 1, 2005, the District shall submit a plan, including a schedule and financial plan, for completing all repairs, renovations, and upgrades necessary to ensure continuous operation of each pump station.
  3. The District will revise its Sanitary Sewer Overflow Prevention Plan to include information found during study of the pump station. The District shall include in its Sanitary Sewer Overflow Prevention Plan monthly on-load checks of each pump station standby generator.

**F. Fats, Oils & Grease (FOG) Blockage Control Plan**

1. By March 1, 2004 the District shall submit a plan, including a schedule for implementation, to EPA describing a program for controlling sources of FOG entering the District's sewage collection system. The program shall be sufficient to eliminate or significantly reduce sewage spills caused by FOG blockage. At a minimum the program shall include:
  - a. Cleaning of sewer pipes prone to FOG blockage;
  - b. Working with cities, as needed, to implement kitchen best management practices at food service establishments necessary to minimize the discharge of FOG to the sewage collection system;
  - c. Working with cities, as needed, to require new and remodeled food service establishments to install and operate properly sized grease interceptors;
  - d. Working with the cities, as needed, to require food service establishments that cause FOG blockages in the District sewers to install and operate properly sized grease interceptors;
  - e. Establish a program to ensure inspections of each food service establishment that discharges FOG to the District's collection system;



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- f. A discussion of options for working with cities to gain legal authorities to enforce municipal requirements for control of FOG discharges from food service establishments; and
  - g. A program for education and outreach to food and service establishments and homeowners on the importance of and methods for controlling FOG discharges to the District's sewage collection system.
2. By September 1 of each year, the District shall submit an annual report to EPA documenting the activities carried out under the FOG Blockage Control Program during the previous year and including copies of the food service establishment inspection and enforcement log for that year.

**IV. PLAN REVIEW AND APPROVAL**

Where this Order requires the submittal of a plan to EPA, that plan shall be subject to EPA review, comment and approval. EPA will, as expeditiously as possible, review and approve or comment on the plan. EPA will complete its review within 60 days of receipt of a plan, or a revised plan, or it will, in writing, extend EPA's review for an additional 30 days. The District shall make any revisions requested by EPA in writing or respond to any EPA comments and submit a revised plan to EPA within 30 days of receipt of EPA's comments or requested revisions. If EPA does not respond by the end of the review period, the District shall implement the plan as submitted. Upon approval of the plans by EPA, the plans are incorporated by reference as an enforceable part of this Order. All annual reports required by this Order are also subject to EPA review and approval in accordance with this paragraph.

**V. QUARTERLY SPILL REPORTS**

Before the first day of February, May, August, and November in each year in which activities are conducted pursuant to this Order, the District shall submit a summary of all sewage spills occurring during the previous calendar quarter, along with primary factors contributing to the spills, if known. The reports shall indicate whether spills are to Waters of the U.S., and include spills to storm drains or other man-made conveyances to such waters.

**VI. ANNUAL PROGRESS REPORTS**

Beginning in 2004, by September 1 of each year in which activities are conducted pursuant to this Order, South Coast WD shall submit a written summary progress report detailing its implementation of the requirements of this Order during the preceding fiscal year (July 1 to June 30). The reports shall also evaluate the effectiveness of the spill

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reduction programs, and detail additional actions the District plans to take to further eliminate spills. The annual progress report shall also contain the wastewater collection system annual budget for the current year. Annual progress reports are subject to EPA review and approval in accordance with Paragraph V.

**VII. INFORMATION SUBMITTAL**

- A. All submittals made pursuant to this Order shall be mailed to the following addresses:

Andrew Sallach  
 U.S. Environmental Protection Agency  
 Clean Water Act Compliance Office (WTR-7)  
 Water Division  
 75 Hawthorne Street  
 San Francisco, CA 94105

John Robertus  
 Attn: POTW Compliance Unit  
 California Regional Water Quality Control Board  
 San Diego Region  
 9174 Sky Park Court, Suite 100  
 San Diego, CA 92123

- B. Such submittals shall include the following certification signed by a duly authorized representative:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

- C. The information requested herein must be provided notwithstanding its possible characterization as confidential business information or trade secrets. EPA has promulgated regulations to protect the confidentiality of the business information it receives. These regulations are set forth in part 2, subpart B of Title 40 of the Code

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of Federal Regulations. A claim of business confidentiality may be asserted in the manner specified by 40 C.F.R. Section 2.203(b) for part or all of the information requested. EPA will disclose business information covered by such a claim only as authorized under 40 C.F.R. part 2, subpart B. If no such claim accompanies the business information at the time EPA receives it, EPA may make it available to the public without further notice.

**VIII. GENERAL PROVISIONS**

- A. This Order is not a permit under the Act, and does not relieve South Coast WD of any obligations imposed by the Act or any other law, regulation or permit.
- B. All requirements to submit information to EPA set forth in this Order are not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because they are not "information collection requests" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See also, 5 C.F.R. §§ 1320.3(c), 1320.4, and 1320.6(a). Furthermore, they are exempt from OMB review under the Paperwork Reduction Act because they are directed to fewer than ten persons and are an exempt investigation. 44 U.S.C. §§ 3502(4), (11), 3518(c)(1); 5 C.F.R. §§ 1320.4 and 1320.6(a).
- C. Issuance of an Order for Compliance shall not be deemed an election by EPA to forego any administrative, civil, or criminal action to seek penalties, fines, or other appropriate relief under the Act.
- D. Failure to respond, or any other violation of the terms of this Order could subject South Coast WD to a civil action for appropriate relief pursuant to Section 309(b) of the Act [33 U.S.C. 1319(b)], and/or penalties under Section 309(d) of the Act [33 U.S.C. 1319(d)]. In addition, Section 309(c)(1) of the Act [33 U.S.C. 1319(c)(1)] provides that negligent violations may be punished by a fine of not less than \$2,500 per day or more than \$25,000 per day of violation, or imprisonment for not more than one year, or both. Section 309(c)(2) of the Act [33 U.S.C. 1319(c)(2)] provides that knowing violations may be punished by a fine of not less than \$5,000 per day or more than \$50,000 per day of violation, or imprisonment for not more than three years, or both. Section 309(c)(4) of the Act [33 U.S.C. 1319(c)(4)] provides penalties for knowingly making false statements.
- E. If any event occurs that may cause a failure to timely carry out any requirement of this Order, the District shall notify EPA in writing within twenty-one (21) calendar days of the time the District becomes aware of the effect the event may have on compliance. The notice shall describe in detail the precise cause of the failure and measures taken to prevent or minimize the failure. The District shall implement reasonable measures to avoid or minimize any such failure. Failure of the District to timely notify shall render the provisions of this paragraph void and of no effect as to the particular incident involved. For purposes of this Order, a Force Majeure is

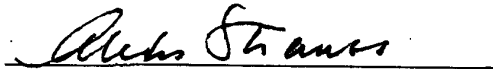
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defined as any event arising from causes beyond the control of the District and which could not be overcome or prevented by due diligence, and which delays or prevents performance by a date required by this Order. If EPA agrees that the delay was caused by circumstances beyond the control of the District, EPA shall modify this Order to provide additional time for performance of the requirement and as applicable, any subsequent requirement.

- F. This Order remains in effect until terminated by the Director of the Water Division, EPA, Region 9. Such termination shall not occur before December 31, 2004, unless the Director determines otherwise. The District may petition the Director to terminate the order based on the District's progress toward reducing and eliminating sewage spills that are a violation of the CWA and certification by the District that they have completed each requirement of this Order and have in place programs and financial plans to assure the continued improvement of the collection system.

Dated this 30<sup>th</sup> day of September, 2003



Alexis Strauss, Director

Water Division  
U.S. Environmental Protection Agency  
Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**ATTACHMENT 1: Finding of Violation and Order Docket No. CWA 402-9-03-29**

**South Coast Water District**  
**Sewage Spills to Waters of the United States: February 1, 1999 to March 31, 2003<sup>1</sup>**

Date	Overflow Location (Street, City <sup>2</sup> )	Total Overflow Volume (gallons)	Reached Surface Waters?
14 Jan 03	Lift Sta 2, L B	1,000 <sup>3</sup>	yes
13 Sep 02	Lift Sta 11, D P	350 <sup>3</sup>	yes
27 Feb 02	56 N La Sevela, S L	150	yes
23 Dec 01	Seven Seas /Crown Valley, D P	150 <sup>3</sup>	yes
7 Dec 01	Stonehill & Del Obispo, D P	500 <sup>3</sup>	yes
17 Jul 01	Palo Alto & Stonehill, D P	3,000	yes
7 Apr 01	31331 Holly Dr, L B	20	yes
14 Mar 01	31561 Table Rock Dr, L B	100	yes
4 Mar 01	Valido Road, S L	1,800 <sup>3</sup>	yes
12 Jan 01	24576 Santa Clara, D P	20	yes
12-13 Dec 00	Monarch Reach Dr, D P	3,000	yes
2 Sep 00	Calle Portola /Calle Velez, C B	3,000	yes
5 Aug 00	24796 Sun Star, D P	1,500	yes
14 May 00	Calle Loma & Fortuna, C B	1,000	yes
26 Apr 00	33571 Windjammer, D P	300	yes
3 Apr 00	34092 Amber Lantern, D P	100	yes
18 Jan 00	5 <sup>th</sup> Ave & Pacific Coast Hwy, L B	25	yes
14 Nov 99	32631 Seven Seas, D P	6,000	yes
30 Oct 99	Valido Rd & West St, L B	600	yes
19 Jul 99	Metona & Pacific Coast Hwy, D P	50	yes
20 Mar 99	Calle Hermosa & Cale Rosita, C B	6,000	yes

<sup>1</sup> Sources: February 1999 - June 2002: Spill reports provided by the District in response to EPA's July 26, 2001 letter requesting information and inspection on July 16, 2002; July 2002 - March 2003: Spill reports provided by the San Diego RWQCB.

<sup>2</sup>Cities are Dana Point (D P), Laguna Beach (L B), Capistrano Beach (C B), and South Laguna (S L)

<sup>3</sup> South Coast WD reported that, a portion of the spilled sewage was recovered.

**ATTACHMENT 3: Finding of Violation and Order Docket No. CWA 402-9-03-29**

**South Coast Water District**  
**Timetable of Order Requirements**

**March 1, 2004**

- III.A.1. Sewer Cleaning and Root Control Plan\*
- III.C.1. Sewer Pipe Inspection and Condition Assessment Plan\*
- III.D.1. Sewer Repair, Rehabilitation and Replacement Plan\*
- III.F.1. Fats, Oils and Grease Blockage Control Plan\*

**September 1, 2004**

- III.E.1. Findings and recommendations from the study of conditions of each pump station.
- III.F.4. Pump Station and Force Main Repair, Renovation and Upgrade Plan\*

**March 1, 2005**

- III.E.3. A plan for completing all repairs, renovations, and upgrades to pump stations

\* Plan subject to review and approval by EPA pursuant to paragraph IV. of this Order.

**Reports**

- February 1: Quarterly Spill Report for October - December (V)
- May 1: Quarterly Spill Report for January - March
- August 1: Quarterly Spill Report for April - June
- September 1: Annual Report for July to June
- November 1: Quarterly Spill Report for July - September (VI)

